IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA

MARTIN LAWRENCE HALL,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, a corporation, THE AEGIS TECHNOLOGIES GROUP, INC., SHORT AND LONG TERM DISABILITY INSURANCE PLAN, an Employee Welfare Benefit Plan, and THE AEGIS TECHNOLOGIES GROUP, INC., a corporation,

Defendants.

Case No.:

Removed from the Twenty-Third Judicial Circuit of Madison County, Alabama, Case No. 47-CV-2019-900138

NOTICE OF REMOVAL

EXHIBIT A

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19 Flage 21/21/2019 4:13 PM

State of Alabama
Unified Judicial System
Form ARCiv-93 Rev. 9/18

COVER SHEET CIRCUIT COURT - CIVIL CASE

(Not For Domestic Relations Cases)

Ca: **47**

47-CV-2019-900138.00 CIRCUIT COURT OF MADISON COUNTY, ALABAMA DEBRA KIZER, CLERK

Judge Code:

Date of Filing: 01/21/2019

OFNEDAL INFORMATION					
GENERAL INFORMATION					
IN THE CIRCUIT C	OURT OF MADISON COUNTY, ALABAMA				
MARTIN LAWRENCE HALL v. THE F	PRUDENTIAL INSURANCE COMPANY OF AMERICA ET AL				
First Plaintiff: Business Individual	First Defendant: ✓ Business Individual				
Government Other	Government				
NATURE OF SUIT: Select primary cause of action	, by checking box (check only one) that best characterizes your action:				
TORTS: PERSONAL INJURY	OTHER CIVIL FILINGS (cont'd)				
	MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/				
☐ TONG - Negligence: General	Enforcement of Agency Subpoena/Petition to Preserve				
☐ TOMV - Negligence: Motor Vehicle	CVRT - Civil Rights				
☐ TOWA - Wantonness	COND - Condemnation/Eminent Domain/Right-of-Way				
☐ TOPL - Product Liability/AEMLD	CTMP - Contempt of Court				
☐ TOMM - Malpractice-Medical	✓ CONT - Contract/Ejectment/Writ of Seizure				
TOLM - Malpractice-Legal	TOCN - Conversion				
TOOM - Malpractice-Other	EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division				
TBFM - Fraud/Bad Faith/Misrepresentation	•				
TOXX - Other:	CVUD - Eviction Appeal/Unlawful Detainer				
TODIO DEDOCNAL INJURY	FORJ - Foreign Judgment				
TORTS: PERSONAL INJURY	FORF - Fruits of Crime Forfeiture				
TOPE - Personal Property					
TORE - Real Properly					
OTHER CIVIL FILINGS	☐ EPFA - Elder Protection From Abuse☐ FELA - Railroad/Seaman (FELA)				
ABAN - Abandoned Automobile					
☐ ACCT - Account & Nonmortgage ☐ WTEG - Will/Trust/Estate/Guardianship/Conservatorship					
APAA - Administrative Agency Appeal	COMP - Workers' Compensation				
ADPA - Administrative Procedure Act	CVXX - Miscellaneous Circuit Civil Case				
☐ ANPS - Adults in Need of Protective Services	_ c yax massaansaa saaan saaa				
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ORIGIN. I WITHETTENS	DISTRICT COURT				
R REMANDED	T TRANSFERRED FROM				
-	OTHER CIRCUIT COURT				
Note: Checking "Yes" does not constitute a demand for a					
HAS JURY TRIAL BEEN DEMANDED? YES VO jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)					
RELIEF REQUESTED: MONETARY AWARD REQUESTED NO MONETARY AWARD REQUESTED					
ATTORNEY CODE:					
HAM033 1/21/2019 4:13:27 PM /s/ KENNETH D HAMPTON					
Date Signature of Attorney/Party filing this form					
MEDIATION REQUESTED: YES NO ✓ UNDECIDED					
Election to Proceed under the Alabama Rules for Expedited Civil Actions:					

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19/11

ELECTRONICALLY FILED Trage 3/21/2019 4:13 PM 47-CV-2019-900138.00 CIRCUIT COURT OF MADISON COUNTY, ALABAMA DEBRA KIZER, CLERK

IN THE CIRCUIT COURT FOR THE TWENTY-THIRD JUDICIAL CIRCUIT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL,)
Plaintiff,)
Vs.) Civil Action:
THE PRUDENTIAL INSURANCE	<i>)</i>
COMPANY OF AMERICA, a corporation, THE AEGIS TECHNOLIGIES GROUP,)
INC., SHORT AND LONG TERM DISABILITY INSUANCE PLAN, an)
Employee Welfare Benefit Plan, and THE AEGIS TECHNOLOGIES GROUP, INC, a)
corporation,)
Defendants.	<i>)</i>

COMPLAINT

- 1. The Plaintiff is Martin Lawrence Hall who is currently a resident of Dublin, Georgia. He was at the time that the events giving rise to this Complaint occurred a resident of Huntsville, Madison County, Alabama. The Plaintiff is over the age of nineteen (19) years.
- 2. The Defendant The Aegis Technologies Group, Inc., is an Alabama corporation located in Huntsville, Madison County, Alabama and was the employer of the Plaintiff in Huntsville, Madison County, Alabama at the time that the contract of insurance was entered into with the Defendant The Prudential Insurance Company

-1-

of America. The Defendant The Aegis Technologies Group, Inc., is the Plan Administrator of the Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan.

- 3. The Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan is an employee welfare benefit plan created to provide short term and long term disability benefits to the Defendant The Aegis Technologies Group, Inc.'s employees and the Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan is located and administered at 410 Jan Davis Drive, Huntsville, Madison County, Alabama.
- 4. The Defendant The Prudential Insurance Company of America is a corporation that is authorized by the State of Alabama to do business in the state of Alabama. The Defendant The Prudential Insurance Company of America is qualified and licensed to sell insurance in the State of Alabama and in Madison County, Alabama and to engage in activities related to the sale of insurance and determining whether to grant or deny claims filed with respect to such insurance policies.
- 5. The Court has jurisdiction of this matter pursuant to 29 <u>U.S.C.</u> § 1132(e)(1) as this proceeding is a proceeding to recover benefits due to the Plaintiff and to enforce his rights to benefits under the terms of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan and the policy of insurance that was issued

to insure benefits under that Plan by the Defendant The Prudential Insurance Company of America.

- 6. The Plaintiff was employed by the Defendant The Aegis Technologies Group, Inc., as a Research Scientist with his date of hire being July 1, 2014 in Huntsville, Madison County, Alabama and his work assignment being in Huntsville, Madison County, Alabama.
- 7. The Plaintiff is a participant and/or insured under the Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan and the policy of insurance issued by the Defendant The Prudential Insurance Company of America beginning on July 1, 2014.
- 8. The Plaintiff's last date of work for the Defendant The Aegis Technologies Group, Inc., was on January 3, 2017 at which time the hereinafter described medical conditions would no longer allow him to continue to work. The Plaintiff did attempt part-time work which ended April 20, 2017.
- 9. The Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan does designate the Defendant The Aegis Technologies Group, Inc., as the Plan Administrator of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan.
- 10. The Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan does designate the Defendant The Prudential Insurance

Company of America as the Claims Administrator of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan with respect to all claims seeking benefits under the terms of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan including the claim presented by the Plaintiff to the Defendants.

- 11. The Plaintiff was an employee of the Defendant The Aegis Technologies Group, Inc. and the policy of insurance issued by the Defendant The Prudential Insurance Company of America states that the Defendant The Aegis Technologies Group, Inc. is the contract holder of the policy of insurance and that the policy of insurance provides coverage for all employees of the Defendant The Aegis Technologies Group, Inc.
- 12. The Defendant The Aegis Technologies Group, Inc. and the Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan both have the principal address of 410 Jan Davis Drive, Huntsville, Madison County, Alabama and the principal address of the Defendant The Aegis Technologies Group, Inc. and the Defendant The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan is the location of the creation of the contract or policy of insurance with the Defendant The Prudential Insurance Company of America and is the location of the filing of the claim for benefits by the Plaintiff. Venue is proper in Madison County, Alabama.

- 13. The Plaintiff initially applied for Long Term disability benefits under the terms of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan with the Defendants by a claim application process that was completed on May 25, 2017. The initial application was supported by an opinion from the Plaintiff's then treating pulmonary physician that the Plaintiff was disabled.
- 14. As the claims administrator under the terms of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan, the Defendant The Prudential Insurance Company of America denied Plaintiff's claim for Long Term Disability benefits initially on July 14, 2017.
- 15. The Plaintiff appealed the initial denial of Long Term Disability benefits under The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan on December 26, 2017 by a written appeal.
- 16. The Defendant The Prudential Insurance Company of America as the claims administrator under The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan denied the first appeal of the Plaintiff's application for Long Term Disability benefits by a written decision dated January 23, 2018.
- 17. The Plaintiff appealed the second denial of his application for Long Term Disability benefits under The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan on July 16, 2018 by a written appeal.

18. The Defendant The Prudential Insurance Company of America as the claims administrator under The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan denied the second appeal of the Plaintiff for Long Term Disability benefits by a written decision dated September 24, 2018. Neither the insurance policy that provides insurance benefits for the employees of the Defendant The Aegis Technologies Group, Inc. nor The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan allows or permits any further administrative appeals.

19. The Plaintiff was employed by the Defendant The Aegis Technologies Group, Inc. in Huntsville, Alabama as a research scientist with an hourly rate of pay of Thirty-Three Dollars and eighty-three cents per hour [\$33.83] and with a scheduled work week of forty hours [40] per week for a gross pay per week of One Thousand Three Hundred Fifty Three Dollars and twenty cents [\$1353.20] per week.

20. The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan provides that benefits under the Plan will begin ninety [90] days from the date that the sickness or illness meets the definition of disability under the terms of the insurance policy. The Plaintiff would have qualified for the Long Term Disability benefits as of April 4, 2017, following the completion of the elimination period under the terms of the insurance policy that insured the benefits of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan.

- 21. The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan and the insurance policy issued by the Defendant The Prudential Insurance Company of America to provide benefits to the employees of the Defendant The Aegis Technologies Group, Inc. provides that benefits will be payable at the rate of sixty percent [60%] of the monthly earnings of the employees of the Defendant The Aegis Technologies Group, Inc. that are participants of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan.
- 22. Based on the formula in insurance policy that insures the benefits under The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan, the Plaintiff's gross monthly benefit amount would be Three Thousand Five Hundred Eighteen Dollars and thirty-two [\$3518.32] per month until his normal retirement age which would be age sixty-seven.
- [23]. The Defendants have not paid the Plaintiff any benefits under the terms of either the insurance policy that insures The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan nor under The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan.
- [24] The Plaintiff suffers from severe persistent asthma and Mast Cell Activation Syndrome causing severe allergic reactions. The Defendant The Prudential Insurance Company of America had the file reviewed by a non-examining physician Dr. Patel who states, "The claimant would need a work environment with no

exposure to fumes, dust (particulate matter less than 10 microns in diameter), allergens, volatile chemicals or pollution, including ozone." Patel Opinion p. 3. This limitation was agreed to by Dr. Taylor, the Plaintiff's then treating pulmonary physician. The opinion also is supported by Dr. Afrin, a Mast Cell Activation Syndrome specialist.

[25] The Plaintiff had the opinion and limitations of Dr. Patel reviewed by Michelle V. Fanucchi, Ph.D., a professor in the Department of Environmental Health Sciences, University of Alabama in Birmingham School of Public Health. Dr. Fanucchi in an opinion that was submitted to the Defendant The Prudential Insurance Company of America as the claims administrator states that "However, unless the working space is set up as a "clean room" with all of the restrictions that are required to meet those standards, it is unlikely that any office space (or home or medical office) would meet the expectation of "no exposure" to any of the above referenced compounds."

[26] After the opinions of Dr. Patel, Dr. Taylor and Dr. Fanucchi were obtained, those opinions and the resulting limitations were submitted to a vocational expert who Plaintiff determined that the combined medical and environmental limitations would prevent the Plaintiff from performing any work activity and specifically noting that the environmental restrictions prevented employment.

[27] The January 23, 2018 decision of the Defendant The Prudential Insurance Company of America by a different medical reviewer acknowledges that if the opinion of Dr. Patel, who was a reviewer for the Defendant The Prudential Insurance Company of America, and the opinion of Dr. Fanucchi were accepted that it would be unlikely that any such work place exist or could be established.

[28] The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan under the terms of the insurance policy that was issued to insure benefits under the Plan and issued by the Defendant The Prudential Insurance Company of America defines disability as "You are unable to perform the material and substantial duties of your regular occupation, or you have a 20% or more loss in your monthly earnings, and You are under the regular care of a doctor."

[29] The Plaintiff meets the test of disability under terms of the insurance policy that insures the Long Term Disability benefits for the employees and participants in The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan as shown by the medical and environmental work limitations that he suffers.

[30] The Defendants did wrongfully, arbitrarily, and capriciously deny the Plaintiff
Long Term Disability benefits under the policy of insurance issued by the Defendant
The Prudential Insurance Company of America and under the terms of The Aegis
Technologies Group, Inc., Short and Long Term Disability Insurance Plan as the
Plaintiff is not able to engage the material and substantial duties of his regular

occupation as a research scientist. The Defendant The Prudential Insurance Company of America did act in an arbitrary and capricious manner and in bad faith in denying benefits to the Plaintiff and in an effort to protect the financial interests of The Prudential Insurance Company of America in breach of the fiduciary duties of the Defendant The Prudential Insurance Company of America.

[31] The denial of Long Term Disability benefits to the Plaintiff under the terms of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan is a breach of the insurance policy issued by the Defendant The Prudential Insurance Company of America.

[32] As a proximate consequence of the wrongful, arbitrary, and capricious denial of benefits under The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan and the breach of the insurance policy that insures The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan, the Plaintiff has been caused to suffer the loss of benefits under the terms of the insurance policy and The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan at the rate of Three Thousand Five Hundred Eighteen Dollars and thirty-two [\$3518.32] per month since April 4, 2017 and will continue to suffer the loss of benefits in the future at the rate of Three Thousand Five Hundred Eighteen Dollars and thirty-two [\$3518.32] per month.

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[33] There are no remaining appeals administratively before the Defendants and the Plaintiff has exhausted all of his administrative remedies in this matter.

Wherefore, the Plaintiff demands a judgment against the Defendants for all benefits that he is entitled to receive under the terms of The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan and insurance policy that insures benefits for the participants and employees of The Aegis Technologies Group, Inc., whether such benefits are actual and/or compensatory damages, attorney fees, costs, and such other, further, and different relief as the Court deems just, proper, and equitable.

Date: January $\frac{\lambda}{1}$, 2019

Kenneth D. Hampton

Attorney for the Plaintiff Attorney ID: HAM033 Suite A, 2004 Poole Drive

Huntsville, Al 35810

Telephone: 256-859-8900

Fax: 256-859-8853

E-mail: kenhampton@bellsouth.net

Serve Defendants by Attorney Initiated Certified Mail:

[1]
The Prudential Insurance Company of America
CT Corporation System, Registered Agent
2 North Jackson Street, Suite 605
Montgomery, Al 36104

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19 Page 14 of 63

[2]

The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan
The Aegis Technologies Group, Inc., Designated Plan Agent
Attention: Human Resources Department
410 Jan Davis Drive
Huntsville, Al 35806

[3]

The Aegis Technologies Group, Inc., Plan Administrator Attention: Human Resources Department 410 Jan Davis Drive Huntsville, Al 35806



47-CV-2019-900138.00

To: KENNETH D HAMPTON kenhampton@bellsouth.net

NOTICE OF ELECTRONIC FILING

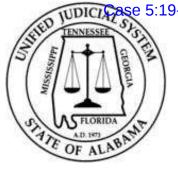
IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following complaint was FILED on 1/21/2019 4:13:59 PM

Notice Date: 1/21/2019 4:13:59 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA CT CORPORATION SYSTEM
2 N JACKSON ST. SUITE 605
MONTGOMERY, AL, 36104

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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DEBRA KIZER
CIRCUIT COURT CLERK
MADISON COUNTY, ALABAMA
MADISON COUNTY, ALABAMA
100 NORTHSIDE SQUARE
HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: THE AEGIS TECHNOLOGIES GROUP INC, ATTN: HUMAN RESOURCES DEP 410 JAN DAVIS DRIVE HUNTSVILLE, AL, 35806

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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MADISON COUNTY, ALABAMA
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HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: THE AEGIS TECHNOLOGIES GROUP INC SHORT TERM AND LOI ATTN: HUMAN RESOURCES DEP
410 JAN DAVIS DRIVE
HUNTSVILLE, AL, 35806

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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DEBRA KIZER
CIRCUIT COURT CLERK
MADISON COUNTY, ALABAMA
MADISON COUNTY, ALABAMA
100 NORTHSIDE SQUARE
HUNTSVILLE, AL, 35801

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017

SUMMONS - CIVIL -

Court Case Number 47-CV-2019-900138.00

Form C-34 Rev. 4/2017	- CIVIL -						
		RT OF MADISON COUNTY, RUDENTIAL INSURANCE C		ICA ET			
		AMERICA, CT CORPORATION SYSTEM					
		(Name and Address of Defendant	*)				
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), KENNETH D HAMPTON							
	[N	ame(s) of Attorney(s)]					
WHOSE ADDRESS(ES) IS/ARE	E: <u>SUITE A, 2004 POO</u> I	LE DRIVE, HUNTSVILLE, AL 35 [Address(es) of Plaintiff(s)		·			
THE ANGWED MUST BE MA		- , , , , , , , , , , , , , , , , , , ,		COMPLAINT OF			
THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.							
TO ANY SHERIF		AUTHORIZED BY THE ALARE TO SERVE PROCESS:	ABAMA RULES OF	CIVIL			
☐ Vou are hereby command		mons and a copy of the Com	anlaint or other docum	nent in			
-		mons and a copy of the con	ipidint of other docum				
•	this action upon the above-named Defendant. Service by certified mail of this Summons is initiated upon the written request of MARTIN LAWRENCE HALL						
		·					
pursuant to the Alabama Rules of the Civil Procedure. [Name(s)]							
1/21/2019 4:13:59 PM	<u></u>	/s/ DEBRA KIZER	By:	(4)			
(Date)		(Signature of Clerk)		(Name)			
✓ Certified Mail is hereby requested. /s/ KENNETH D HAMPTON (Plaintiff's/Attorney's Signature)							
	RFTI	JRN ON SERVICE					
Return receipt of certified mail received in this office on							
☐ I certify that I personally d	elivered a copy of thi	s Summons and Complaint o	, ,				
		in		County,			
(Name of Perso	on Served)	(Na	me of County)				
Alabama on							
-	(Date)						
			(Address of Server)				
(Type of Process Server)	(Server's Sig	gnature)					
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(Server's Printed Name)			(Phone Number of Serv	ver)			

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017

SUMMONS - CIVIL -

Court Case Number 47-CV-2019-900138.00

Form C-34 Rev. 4/2017	- (SIVIL -			
IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET					
NOTICE TO: THE AEGIS TECHNOLOGIES GROUP INC,, ATTN: HUMAN RESOURCES DEP 410 JAN DAVIS DRIVE, HUNTSVILLE, AL 35806					
		(Name and Address	of Defendant)		
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), KENNETH D HAMPTON					
	_	Name(s) of Attorney(s)]			
WHOSE ADDRESS(ES) IS/A	RE: SUITE A, 2004 POC			i810 or Attorney(s)]	
	SERVED ON YOU OR	A JUDGMENT BY D	EFAULT MA	HIS SUMMONS AND COMPLAINT OR AY BE RENDERED AGAINST YOU FOR CUMENT.	
TO ANY SHER		N AUTHORIZED BY JRE TO SERVE PE		ABAMA RULES OF CIVIL	
☐ You are hereby comma	nded to serve this Sun	nmons and a copy	of the Com	plaint or other document in	
this action upon the abo	ve-named Defendant.				
Service by certified mai	of this Summons is in	itiated upon the wri	itten reques	st of MARTIN LAWRENCE HALL	
pursuant to the Alabam	a Rules of the Civil Pro	ocedure.		[Name(s)]	
1/21/2019 4:13:59	PM	/s/ DEBRA	KIZER	By:	
(Date)		(Signature	of Clerk)	(Name)	
✓ Certified Mail is hereby	Certified Mail is hereby requested. /s/ KENNETH D HAMPTON (Plaintiff's/Attorney's Signature)				
RETURN ON SERVICE					
Return receipt of certified	ed mail received in this	office on			
_				(Date)	
I certify that I personally	delivered a copy of th	is Summons and C	complaint o	or other document to	
		in		County,	
(Name of Pe	rson Served)		(Nai	me of County)	
Alabama on		•			
	(Date)				
				(Address of Server)	
(Type of Process Server)	(Server's S	ignature)			
	(Server's P	rinted Name)		(Phone Number of Server)	
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State of Alabama Unified Judicial System Form C-34 Rev. 4/2017

SUMMONS - CIVIL -

Court Case Number 47-CV-2019-900138.00

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET

NOTICE TO: THE AEGIS TECHNOLOGIES GROUP INC SHORT TERM AND LONG TERM DISABILITY INSURANCE PLAN, ATTN: HUMAN RESOURCES DEP 410 JAN DAVIS DRIVE, HUNTSVILLE, AL 35806

(Name and Address of Defendant) THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), KENNETH D HAMPTON [Name(s) of Attorney(s)] WHOSE ADDRESS(ES) IS/ARE: SUITE A, 2004 POOLE DRIVE, HUNTSVILLE, AL 35810 [Address(es) of Plaintiff(s) or Attorney(s)] THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT. TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS: You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant. Service by certified mail of this Summons is initiated upon the written request of MARTIN LAWRENCE HALL [Name(s)] pursuant to the Alabama Rules of the Civil Procedure. 1/21/2019 4:13:59 PM /s/ DEBRA KIZER By: (Date) (Signature of Clerk) (Name) Certified Mail is hereby requested. /s/ KENNETH D HAMPTON (Plaintiff's/Attorney's Signature) **RETURN ON SERVICE** Return receipt of certified mail received in this office on ☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to County, (Name of County) (Name of Person Served) Alabama on (Date) (Address of Server) (Type of Process Server) (Server's Signature) (Server's Printed Name) (Phone Number of Server)

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19

Proc 24/21/2019 4:44 PM

47-CV-2019-900138.00

CIRCUIT COURT OF

MADISON COUNTY, ALABAMA

DEBRA KIZER, CLERK

IN THE CIRCUIT COURT FOR THE TWENTY-THIRD JUDICIAL CIRCUIT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL,)
Plaintiff,)
Vs.) Civil Action: <u>47-CV-2019-900138</u>
THE PRUDENTIAL INSURANCE COMPANY)
OF AMERICA, a corporation, THE AEGIS)
TECHNOLIGIES GROUP, INC., SHORT AND)
LONG TERM DISABILITY INSUANCE PLAN,	an)
Employee Welfare Benefit Plan, and THE AEGIS)
TECHNOLOGIES GROUP, INC, a corporation,)
)
Defendants.)

Plaintiff's First Notice Identifying Discovery Materials

Pursuant to the Standing Order of this Court as it pertains to discovery materials and <u>Alabama Rule of Civil Procedure</u> 5(d), please take notice that the following itemized discovery documents have been filed in this action and the originals of such documents are being retained by the Plaintiff's attorney as Custodian and that such itemized discovery documents are or will be served pursuant to <u>Alabama Rule of Civil Procedure</u> 4 in this matter with the Summons and Complaint:

[1] Plaintiff's First Set of Request for Production of Documents to The Prudential Insurance Company of America.

Date: January <u>21</u>, 2019

Kenneth D. Hampton HAM033

Attorney for Plaintiff Suite A, 2004 Poole Drive Huntsville, Alabama 35810 Telephone: 256-859-8900

Fax: 256-859-8853

Email: kenhampton@bellsouth.net

IN THE CIRCUIT COURT FOR THE TWENTY-THIRD JUDICIAL CIRCUIT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL,)
Plaintiff,	, •)
Vs.) Civil Action: <u>47-CV-2019-900138</u>
THE PRUDENTIAL INSURANCE COMPANY))
OF AMERICA, a corporation, THE AEGIS) .
TECHNOLIGIES GROUP, INC., SHORT AND)
LONG TERM DISABILITY INSUANCE PLAN, at	n)
Employee Welfare Benefit Plan, and THE AEGIS)
TECHNOLOGIES GROUP, INC, a corporation,)
•)
Defendants.)

Plaintiff's First Request for Production of Documents, etc., to Defendant The Prudential
Insurance Company of America, a corporation,

Comes now the Plaintiff, Martin Lawrence Hall, pursuant to <u>Alabama Rule of Civil</u>

<u>Procedure</u> 34, and requests the Defendant, The Prudential Insurance Company of America, a corporation, to respond within forty-five (45) days to the following requests:

Miscellaneous Instructions:

- {a} If any document responsive to these requests for production has been lost, destroyed, or is otherwise not in existence or not capable of production, describe the document, its contents and the reason(s) for non-availability.
- {b} Plaintiff expressly reserves the right to challenge any claim of privilege, but if in responding to any request for production and/or identifying any document that is responsive to the following requests for production, the Defendant The Prudential Insurance Company of America, a corporation, finds it necessary to claim privilege of any type, redact the language of such document

that you claim to be privileged and produce the edited version openly and plainly stating on the document produced to the Plaintiff "Edited".

{c} If any document, thing, picture, video, and/or other item requested by these requests for production of documents shall be created, stored, filed, maintained or otherwise have a digital or electronic format file of any type, the document, thing, picture, video, and/or other item requested shall be produced in its unedited digital and/or electronic format.

Requests For Production:

- [1] That the Defendant, The Prudential Insurance Company of America, a corporation, produce and permit the Plaintiff to inspect and to copy each of the following documents, items, or things:
 - (A) The application for the long term disability insurance policy and/or employee plan benefit made with the Defendant, The Prudential Insurance Company of America, a corporation, and/or the Plaintiff's Employer, The Aegis Technologies Group, Inc., a corporation, with respect to long term disability benefits sought by the Plaintiff pursuant to the terms of the insurance policy and/or employee benefit plan that applies to the Plaintiff.
 - (B) A certified copy of the Long Term Disability Plan, the insuring insurance policy, declarations page, all amendments to either the Long Term Disability Plan and/or the insuring insurance policy since the original effective date of the original Long Term Disability plan, and all endorsements with respect to the long term disability benefits policy issued by the Defendant, The Prudential Insurance Company of America, a corporation, and which applies to the proof of claim and/or statement of claim filed by or on behalf of the Plaintiff for long term disability benefits. This request for Production in addition to the documents described above shall specifically include, but shall not be limited to:
 - [1] The Plan documents including any wrap around plan documents in complete form.
 - [2] All Annual Return/Report of Employee Benefit Plans, Form 5500, including all documents filed with such forms.
 - [3] All Plan documents that are accessible by "links" or are available on any website maintained by: The Prudential Insurance Company of America, a corporation.

- (C) A certified copy of the Summary Plan Description with respect to the employee benefits plan that applies to the employees of The Aegis Technologies Group, Inc., a corporation, with respect to the long term disability benefits for which the policy was issued by the Defendant, The Prudential Insurance Company of America, a corporation, including all amendments to the Summary Plan Description since the original effective date of the long term disability plan and showing the effective date of each such amendment.
- (D) Any and all letters, mailgrams, e-mail transmissions, telegrams, memorandums of conversations with the Plaintiff, and/or other correspondence to the Plaintiff in the possession of the Defendant, The Prudential Insurance Company of America, a corporation, , regardless of the source from which such document was received and regardless of the source that created the document and to specifically include all such documents created by the Defendant, The Prudential Insurance Company of America, a corporation, .
- (E) Any and all letters, mailgrams, e-mail transmissions, telegrams, and/or other correspondence received by and/or sent by the Defendant, The Prudential Insurance Company of America, a corporation, from the Plaintiff and/or anyone on behalf of the Plaintiff, to include but not be limited to any healthcare provider and/or person acting as the representative of the Plaintiff.
- (F) Any and all manuals, memorandums, internal policy procedures describing or prescribing the claims evaluation process by the Defendant, The Prudential Insurance Company of America, a corporation, with respect to the type of policy by which the Plaintiff is seeking benefits.
- (G) Any and all internal letters, internal e-mails, fax transmittals, internal memorandums, or any other written communication with respect to the policy and/or any claim filed by the Plaintiff with the Defendant, The Prudential Insurance Company of America, a corporation.
- (H) Any and all proofs of claim and/or statements of claim filed by the Plaintiff or on behalf of the Plaintiff with the Defendant, The Prudential Insurance Company of America, a corporation, and/or the Plaintiff's Employer, The Aegis Technologies Group, Inc., a corporation, seeking long term disability benefits together with all other documents filed with the proof of claim and/or statement of claim.
- (I) Any and all underwriting manuals that discuss, relate to, or provide for the type of policy purchased from the Defendant, The Prudential Insurance Company of America, a corporation, and through which the Plaintiff is seeking benefits.
- (J) Any and all manuals, memorandums, or other internal statements of the Defendant, The Prudential Insurance Company of America, a corporation,

interpreting the policy language and exclusions and interpreting the language of any and all endorsements of the policy purchased by the Plaintiff from the Defendant, The Prudential Insurance Company of America, a corporation. This request shall include any such manuals, memorandums, or documents that are internal to the Defendant, The Prudential Insurance Company of America, a corporation, but which were provided to the Plaintiff and/or the Plaintiff's Employer as a part of the marketing, sale, or explanation of benefits under the terms of the Long Term Disability Plan.

- (K) Any and all file jackets, folders, daily activity logs, contents of file jackets, contents of folders, and/or daily diary logs of the Defendant, The Prudential Insurance Company of America, a corporation, , or its employees containing written notes, written entries, electronic information, e-mails, photographs, digital pictures, digital videos, and/or any other information with respect to the Plaintiff and/or the insurance policy purchased from the Defendant, The Prudential Insurance Company of America, a corporation, , by the Plaintiff, and/or any claim filed on behalf or by the Plaintiff, and/or internal conversations or discussions of the Defendant, The Prudential Insurance Company of America, a corporation, or its employees with respect to the Plaintiff, the policy insuring long term disability benefits for the Plaintiff, or any claim filed by or on behalf of the Plaintiff.
- (L) Any and all internal newsletters or memoranda circulated regularly in the disability claims department of the Defendant, The Prudential Insurance Company of America, a corporation.
- (M) Any and all external newsletters, insurance industry publications, or memoranda circulated regularly in the claims department of the Defendant, The Prudential Insurance Company of America, a corporation.
- (N) A complete copy of all medical records, written job description of the job the Plaintiff held with The Aegis Technologies Group, Inc., a corporation, occupational evaluations, correspondence sent to or received from any healthcare provider, and/or any other medical and/or vocational information relating to the Plaintiff and in the possession of the Defendant, The Prudential Insurance Company of America, a corporation.
- (O) Any and all letters, e-mails, correspondence, and/or other documents received by the Defendant, The Prudential Insurance Company of America, a corporation, from any and all non-examining physicians, vocational experts, rehabilitation experts, and/or any other healthcare experts with respect to the Plaintiff.
- (P) Any and all letters, mailgrams, e-mail transmissions, telegrams, and/or other correspondence received by or sent by the Defendant, The Prudential Insurance Company of America, a corporation, or any employee of the Defendant, The Prudential Insurance Company of America, a corporation, with respect to the Plaintiff to any person, partnership, corporation, and/or other entity, including other

employees of the Defendant, The Prudential Insurance Company of America, a corporation, .

- (Q) A complete copy of any and all surveillance videos, digital pictures/images, films, tapes of any type, digital tapes, video tapes, CD Rom images, DVD images, and/or any other photographic images of the Plaintiff regardless of when taken and regardless of by whom taken.
- (R) A resume, or "CV", and a copy of the retainer and/or fee schedule for each expert witness which the Defendant, The Prudential Insurance Company of America, a corporation, , will offer to testify, or from which the Defendant, The Prudential Insurance Company of America, a corporation, , will offer an opinion, and/or upon which the Defendant, The Prudential Insurance Company of America, a corporation, , has based any decision with respect to the grant or denial of long term disability benefits to the Plaintiff.
- (S) Each and every document, books, treatise, electronic data, statement, interview, and/or other document which the Defendant, The Prudential Insurance Company of America, a corporation, used to make any decision with respect to the grant or denial of long term disability benefits to the Plaintiff.
- (T) Any and all notices of cancellation, certificates of mailing of such notices of cancellation, and postage receipts with respect to such notices of cancellations in reference to the long term disability insurance policy issued by the Defendant, The Prudential Insurance Company of America, a corporation, and under which the Plaintiff is seeking benefits.
- (U) Any and all statements of account and/or other accounting records showing the date and the amount of premiums paid to the Defendant, The Prudential Insurance Company of America, a corporation, by or on behalf of the Plaintiff and/or the employee benefit plan of the Employer, The Aegis Technologies Group, Inc., a corporation, , within the preceding twenty-four [24] months as it relates to the long term disability insurance policy issued by the Defendant, The Prudential Insurance Company of America, a corporation, , and under which the Plaintiff is seeking benefits.
- (V) Any and all advertising and/or promotional materials with respect to the type of insurance policy under which the Plaintiff is seeking long term disability benefits that have been issued by the Defendant, The Prudential Insurance Company of America, a corporation, from the effective date of the policy that provides coverage for the Plaintiff or for the past thirty-six months, whichever is longer. This request shall include, but not be limited to, booklets, oral advertising recordings, video advertising recordings, DVDs, internet web site promotional/informational material, direct mail promotional material, and/or any other document, electronic file, newspaper file, mail-out or other material that advertised the type of long term disability insurance policy and/or the particular long term disability insurance

policy sold by the Defendant, The Prudential Insurance Company of America, a corporation,, and under which the Plaintiff is seeking long term disability benefits.

(W) Any and all letters, mailgrams, e-mail transmissions, telegrams, memorandums of conversations with the Plaintiff's employer, The Aegis Technologies Group, Inc., a corporation, or any employee of the Plaintiff's employer, and/or other correspondence either sent to and/or received from the Plaintiff's employer, The Aegis Technologies Group, Inc., a corporation, in the possession of the Defendant, The Prudential Insurance Company of America, a corporation.

(X) In the event that the Defendant, The Prudential Insurance Company of America. a corporation, has delegated the claims decision making to some entity other than the Defendant, The Prudential Insurance Company of America, a corporation, a complete copy any and all contracts between the Defendant, The Prudential Insurance Company of America, a corporation, and the entity to whom the claims decision making duties under the policy were delegated.

That the above described documents shall be produced at the office of the Attorney for the Plaintiff located at: Suite A, 2004 Poole Drive, Huntsville, Alabama 35810 at 9 o'clock a.m. on the forty-fifth (45th) day following the service of the Summons and Complaint in this matter, unless such day is a Saturday, Sunday or legal holiday, in which event the documents shall be produced the next regular business day at 9 o'clock a.m., for the purpose of permitting the Plaintiff, by and through his attorney, to inspect and copy such documents.

Date: January_21 .2019

Kenneth D. Hampton HAM033

Attorney for Plaintiff Suite A, 2004 Poole Drive

Huntsville, AL 35810 Telephone: 256-859-8900

Fax: 256-859-8853

e-mail: kennethdhampton@bellsouth.net



47-CV-2019-900138.00

To: KENNETH D HAMPTON kenhampton@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following discovery was FILED on 1/21/2019 4:44:39 PM

Notice Date: 1/21/2019 4:44:39 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA (PRO SI CT CORPORATION SYSTEM
2 N JACKSON ST. SUITE 605
MONTGOMERY, AL, 36104-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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DEBRA KIZER
CIRCUIT COURT CLERK
MADISON COUNTY, ALABAMA
MADISON COUNTY, ALABAMA
100 NORTHSIDE SQUARE
HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: THE AEGIS TECHNOLOGIES GROUP INC, (PRO SE)
ATTN: HUMAN RESOURCES DEP
410 JAN DAVIS DRIVE
HUNTSVILLE, AL, 35806-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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MADISON COUNTY, ALABAMA
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100 NORTHSIDE SQUARE
HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: INSURANCE PLAN THE AEGIS TECHNOLOGIES GROUP INC SH ATTN: HUMAN RESOURCES DEP 410 JAN DAVIS DRIVE HUNTSVILLE, AL, 35806-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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MADISON COUNTY, ALABAMA
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HUNTSVILLE, AL, 35801

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STATE OF ALABAMA	3-MITH DOCK Revised 3/5/08	iment 1	-I Fileu	02/20 C	as		/21/2019 4:48 PM CV-2019-900138.00
Unified Judicial System					OF ALM		RCUIT COURT OF
47-MADISON	District Court	✓ Circu	iit Court	C,	V2(1	MADISO	ON COUNTY, ALABAMA BRA KIZER, CLERK
MARTIN LAWRENCE HALL V. THE PI INSURANCE COMPANY OF AMERICA	AWRENCE HALL V. THE PRUDENTIAL CE COMPANY OF AMERICA ET		CIVIL MOTION COVER SHEET Name of Filing Party:C001 - HALL MARTIN LAWRENCE			_	
Name, Address, and Telephone No. of Attorney	or Party. If Not Repr	esented.	☐ Oral Arç	guments	s Request	ed	
KENNETH D HAMPTON							
SUITE A, 2004 POOLE DRIVE							
HUNTSVILLE, AL 35810							
Attorney Bar No.: HAM033							
	TYPE	OF MOTI	ON				
Motions Requiring Fee				М	otions Not	Requirin	g Fee
Default Judgment (\$50.00)			Add Party				
Joinder in Other Party's Dispositive Mo			Amend				
(i.e.Summary Judgment, Judgment or orother Dispositive Motion not pursuar			Change of	f Venue/	Transfer/		
(\$50.00)	12 (b))		Compel				
☐Judgment on the Pleadings (\$50.00)			Consolidat	tion			
─Motion to Dismiss, or in the Alternative	9		Continue				
^{└─} SummaryJudgment(\$50.00)			Deposition	1			
Renewed Dispositive Motion(Summar			Designate	a Media	ator		
Judgment, Judgment on the Pleadings Dispositive Motion not pursuant to Rule			Judgment	as a Ma	atter of Lav	w (during	Trial)
Summary Judgment pursuant to Rule	. ,, .		Disburse F	Funds			
Motion to Intervene (\$297.00)	σο(φσο.σο)		Extension	of Time	!		
Other			In Limine				
pursuant to Rule	(\$50.00) [Joinder				
paredam to reac	(φοσ.σ.	°'	More Defir	nite Stat	ement		
*Motion fees are enumerated in §12-19-7 pursuant to Local Act are not included. P			☐ Motion to Dismiss pursuant to Rule 12(b)☐ New Trial				
Clerk of the Court regarding applicable lo	ocal fees.		☐ Objection of Exemptions Claimed				
Local Court Costs \$ 0			Pendente		iptions oil	annea	
	_		Plaintiff's N	Motion to	o Dismiss		
			Preliminary	y Injunc	tion		
			Protective				
			Quash				
			Release from	om Stay	y of Execu	ıtion	
			Sanctions				
			Sever				
			Special Pra	actice ir	ո Alabama	i	
			Stay				
			Strike				
			Supplemer	nt to Pe	nding Mot	ion	
			Vacate or I	Modify			
			Withdraw				
		_	Other		est for Ce ney Initiate		ail Service
		' pı	ırsuant to R				(Subject to Filing Fee)
Check here if you have filed or are filing contemoraneously with this motion an Affidavit of Substantial Hardship or if yo are filing on behalf of an agency or department of the State county, or municipal government. (Pursuant to §6-5-1 Code	1/21/2019 4:	:47:14 PM	I	,	gnature of A KENNETH	,	· ·
of Alabama (1975), governmental entities are exempt from prepayment of filing fees)							

^{*}This Cover Sheet must be completed and submitted to the Clerk of Court upon the filing of any motion. Each motion should contain a separate Cover Sheet.

**Motions titled 'Motionations in the reconstruction of the subsection of the subsec

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19//Page

CIRCUIT COURT OF MADISON COUNTY, ALABAMA DEBRA KIZER, CLERK

IN THE CIRCUIT COURT FOR THE TWENTY-----JUDICIAL CIRCUIT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL,)
Plaintiff,)
Vs.) Civil Action: <u>47-CV-2019-900138</u>
THE PRUDENTIAL INSURANCE COMPANY)
OF AMERICA, a corporation, THE AEGIS)
TECHNOLIGIES GROUP, INC., SHORT AND)
LONG TERM DISABILITY INSUANCE PLAN, as	(n)
Employee Welfare Benefit Plan, and THE AEGIS)
TECHNOLOGIES GROUP, INC, a corporation,)
•)
Defendants.)

Plaintiff Requests Certified Mail Service on the Defendants

Comes now the Plaintiff pursuant to Alabama Rule of Civil Procedure 4 and Alabama Rule of Civil Procedure 4(i)(2)(B)(ii) permitting attorney initiated service and requests that certified mail service of the Summons and Complaint in this matter be made on the Defendants, return receipt requested, by serving the Defendant as follows using attorney initiated service:

- [1] The Prudential Insurance Company of America, CT Corporation System, Registered Agent, 2 North Jackson Street, Suite 605, Montgomery, Al 36104
- [2] The Aegis Technologies Group, Inc., Short and Long Term Disability Insurance Plan, The Aegis Technologies Group, Inc., Designated Plan Agent, Attention: Human Resources Department, 410 Jan Davis Drive. Huntsville, Al 35806
- [3] The Aegis Technologies Group, Inc., Plan Administrator, Attention: Human Resources Department, 410 Jan Davis Drive, Huntsville, Al 35806

Date: January 21, 2019

emets D Hon Kenneth D. Hampton HAM033

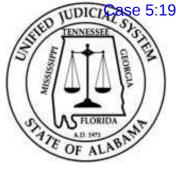
Attorney for Plaintiff

Suite A, 2004 Poole Drive Huntsville, Alabama 35810

Telephone: 256-859-8900

Fax: 256-859-8853

Email: kenhampton@bellsouth.net



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: KENNETH D HAMPTON kenhampton@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following matter was FILED on 1/21/2019 4:48:30 PM

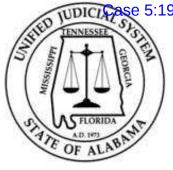
C001 HALL MARTIN LAWRENCE

REQUEST FOR CERTIFIED MAIL SERVICE ATTORNEY INITIATED

[Filer: HAMPTON KENNETH DEWAYNE]

Notice Date: 1/21/2019 4:48:30 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA (PRO SI CT CORPORATION SYSTEM
2 N JACKSON ST. SUITE 605
MONTGOMERY, AL, 36104-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following matter was FILED on 1/21/2019 4:48:30 PM

C001 HALL MARTIN LAWRENCE

REQUEST FOR CERTIFIED MAIL SERVICE ATTORNEY INITIATED

[Filer: HAMPTON KENNETH DEWAYNE]

Notice Date: 1/21/2019 4:48:30 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: THE AEGIS TECHNOLOGIES GROUP INC, (PRO SE)
ATTN: HUMAN RESOURCES DEP
410 JAN DAVIS DRIVE
HUNTSVILLE, AL, 35806-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following matter was FILED on 1/21/2019 4:48:30 PM

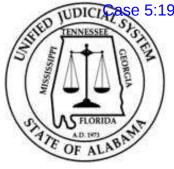
C001 HALL MARTIN LAWRENCE

REQUEST FOR CERTIFIED MAIL SERVICE ATTORNEY INITIATED

[Filer: HAMPTON KENNETH DEWAYNE]

Notice Date: 1/21/2019 4:48:30 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: INSURANCE PLAN THE AEGIS TECHNOLOGIES GROUP INC SH ATTN: HUMAN RESOURCES DEP 410 JAN DAVIS DRIVE HUNTSVILLE, AL, 35806-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following matter was FILED on 1/21/2019 4:48:30 PM

C001 HALL MARTIN LAWRENCE

REQUEST FOR CERTIFIED MAIL SERVICE ATTORNEY INITIATED

[Filer: HAMPTON KENNETH DEWAYNE]

Notice Date: 1/21/2019 4:48:30 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19 Figure 40/25/26/19 2:31 PM 47-CV-2019-900138.00 CIRCUIT COURT OF MADISON COUNTY, ALABAMA DEBRA KIZER, CLERK

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

HALL MARTIN LAWRENCE, Plaintiff,))	
V.) Case No.:	CV-2019-900138.00
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, THE AEGIS TECHNOLOGIES GROUP INC,, INSURANCE PLAN THE AEGIS TECHNOLOGIES GROUP INC SH, Defendants.)	

ORDER

REQUEST FOR CERTIFIED MAIL SERVICE ATTORNEY INITIATED filed by HALL MARTIN LAWRENCE is hereby GRANTED.

DONE this 22nd day of January, 2019.

/s/ CLAUDE E HUNDLEY III CIRCUIT JUDGE



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: HAMPTON KENNETH DEWAYNE kenhampton@bellsouth.net

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

A court action was entered in the above case on 1/22/2019 2:32:06 PM

ORDER

[Filer:]

Disposition: GRANTED Judge: CEH

Notice Date: 1/22/2019 2:32:06 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA (PRO SI CT CORPORATION SYSTEM
2 N JACKSON ST. SUITE 605
MONTGOMERY, AL, 36104-0000

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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ORDER

[Filer:]

Disposition: GRANTED Judge: CEH

Notice Date: 1/22/2019 2:32:06 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: THE AEGIS TECHNOLOGIES GROUP INC, (PRO SE)
ATTN: HUMAN RESOURCES DEP
410 JAN DAVIS DRIVE
HUNTSVILLE, AL, 35806-0000

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

A court action was entered in the above case on 1/22/2019 2:32:06 PM

ORDER

[Filer:]

Disposition: GRANTED Judge: CEH

Notice Date: 1/22/2019 2:32:06 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: INSURANCE PLAN THE AEGIS TECHNOLOGIES GROUP INC SH ATTN: HUMAN RESOURCES DEP 410 JAN DAVIS DRIVE HUNTSVILLE, AL, 35806-0000

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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ORDER

[Filer:]

Disposition: GRANTED Judge: CEH

Notice Date: 1/22/2019 2:32:06 PM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19

ELECTRONICALLY FILED
47/29/2019 11:14 AM
47-CV-2019-900138.00
CIRCUIT COURT OF
MADISON COUNTY, ALABAMA
DEBRA KIZER, CLERK

IN THE CIRCUIT COURT FOR THE TWENTY-THIRD JUDICIAL CIRCUIT OF MADISON COUNTY, ALABAMA

Plaintiff, Vs. Civil Action: 47-CV-2019-90013 THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, a corporation, THE AEGIS TECHNOLIGIES GROUP, INC., SHORT AND LONG TERM DISABILITY INSUANCE PLAN, an) Employee Welfare Benefit Plan, and THE AEGIS TECHNOLOGIES GROUP, INC, a corporation, Defendants.	MARTIN LAWRENCE HALL,)
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, a corporation, THE AEGIS TECHNOLIGIES GROUP, INC., SHORT AND LONG TERM DISABILITY INSUANCE PLAN, an) Employee Welfare Benefit Plan, and THE AEGIS TECHNOLOGIES GROUP, INC, a corporation,	Plaintiff,)
OF AMERICA, a corporation, THE AEGIS (TECHNOLIGIES GROUP, INC., SHORT AND) LONG TERM DISABILITY INSUANCE PLAN, an) Employee Welfare Benefit Plan, and THE AEGIS) TECHNOLOGIES GROUP, INC, a corporation,)	Vs.) Civil Action: <u>47-CV-2019-900138</u>
	OF AMERICA, a corporation, THE AEGIS TECHNOLIGIES GROUP, INC., SHORT AND LONG TERM DISABILITY INSUANCE PLAN, as Employee Welfare Benefit Plan, and THE AEGIS)) n))
Defendants.	TECHNOLOGIES GROUP, INC, a corporation,)
	Defendants.)

Affidavit of Certified Mailing of Process and Complaint

Comes now the attorney for the Plaintiff pursuant to <u>Alabama Rule of Civil Procedure</u> 4(i)(2)(B)(ii) and after first being given an affirmation to speak the truth does depose and state:

I, Kenneth D. Hampton, did on January <u>33</u>, 2019 initiate certified mail service by placing a filed copy of the Summons and Complaint, issued by the Clerk of the below designated Court on January <u>33</u>, 2019, together with Plaintiff's Request for Production to Defendant The Prudential Insurance Company of America in the United States mail, certified mail with return receipt, copies of the return receipts being attached hereto, and with postage prepaid to the following persons, corporations, governmental entities, or other entities:

Entity Served Certified Mail Number

[1] The Prudential Insurance Company of America,

CT Corporation System, Registered Agent,

2 North Jackson Street, Suite 605,

Montgomery, Al 36104

7011 2970 0000 4991 4091

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19 Page 46 of 63

[2] The Aegis Technologies Group, Inc., Short and

Long Term Disability Insurance Plan,

The Aegis Technologies Group, Inc., Designated Plan Agent,

Attention: Human Resources Department, 410 Jan Davis Drive. Huntsville, Al 35806

[3] The Aegis Technologies Group, Inc., Plan Administrator,

Attention: Human Resources Department,

410 Jan Davis Drive,

Huntsville, Al 35806

7011 2970 0000 4991 4107

7011 2970 0000 4991 4084

Court Clerk of Madison County, Alabama whose address is: Circuit Court Clerk, Civil, Madison

I have further caused the originals of the return receipts to be returned to the Circuit

County Courthouse, 100 North Side Square, Huntsville, Alabama, 35801-4280 with the return

receipts showing the following case number: 47-CV-2019-900138. I have personal knowledge of

the facts stated in this affidavit and they are true and correct.

Date: January 23, 2019

Kenneth D. Hampton, [MAM033]

Attorney For Plaintiff

Suite A

2004 Poole Drive

Huntsville, Al 35810

Telephone: 256-859-8900

Fax: 256-859-8853

E-Mail:kenhampton@bellsouth.net

State of Alabama)

County of Madison)

Notary Public

Before me personally appeared the above and foregoing Kenneth D. Hampton, Attorney, and after first making himself known to me, after first being given an affirmation to speak the

Case 5:19-cv-00335-MHH Document 1-1 Filed 02/26/19 Page 47 of 63

truth, he did in my presence, attest and affirm the above and foregoing Affidavit of Certified Mailing of Process and Complaint on this the day of January, 2019.

See Can Pasker
Notary Public, State at Large

My Commission Expires on: <u>Jelevnary 5</u>, 20 22

Case 5:19-cv-00335-MHH Docume SENDER: COMPLETE THIS SECTION	ent 1-1 Filed 02/26/19 Page 48 of 63 complete this section on delivery	
■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse	A. Signature	
so that we can return the card to you.	Li Addressee	
Attach this card to the back of the mailpiece, or on the front if space permits.	B. Received by (Printed Name) C. Date of Delivery	
Article Addressed to:	D. Is delivery address different from item 1? Yes	
The Aegis Technologies Group, Inc.	er delivery address below: No	
Short and Long Term Disability Insurance Plan	1	
The Aegis Technologies Group, Inc., Designate	ed Plan Agent	
Attention: Human Resources Department 410 Jan Davis Drive. Huntsville, Al 35806		
410 Jan Davis Drive. Hanssvire, At 35000	3. Service Type Priority Mail Express®	
	☐ Adult Signature ☐ Registered Mail™ ☐ Adult Signature ☐ Registered Mail Restricted	
9590 9402 4221 8121 3859 28	□ Certified Mail Restricted Delivery □ Return Receipt for	
2 Article Number (Transfer from service label)	☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation™	
7011 2970 0000 4991 4107	☐ Insured Mail ☐ Insured Mail Restricted Delivery (over \$500)	
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt	
		,
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
■ Complete items 1, 2, and 3.	A. Signature	
Print your name and address on the reverse so that we can return the card to you.	X	
Attach this card to the back of the mailpiece,	B. Received by (Printed Name) C. Date of Delivery	
or on the front if space permits. 1. Article Addressed to:	D. Is delivery address different from item 1? Yes	
The Aegis Technologies Group, Inc.	If YES, enter delivery address below:	
Plan Administrator		
Attention: Human Resources Departm	nent	
410 Jan Davis Drive		
Huntsville, Al 35806		
	3. Service Type	
9590 9402 4221 8121 3859 11	☐ Adult Signature Restricted Delivery ☐ Registered Mail Restricted Delivery	
	☐ Certified Mail Restricted Delivery ☐ Receipt for Merchandise ☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation™	
2 Article Number (Transfer from service label) 7011 2970 0000 4991 4084	☐ Insured Mail ☐ Signature Confirmation	
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PS FORTI 30 11, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt	***************************************
	,	
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	-
	A. Signature	
 Complete items 1, 2, and 3. Print your name and address on the reverse 	- Cl Acont	
so that we can return the card to you.	X Addressee	
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Article Addressed to:	D. Is delivery address different from item 1? Yes	
The Prudential Insurance Common of	A marine	
The Prudential Insurance Company of A CT Corporation System, Registered Ag		
2 North Jackson Street, Suite 605	OII.	
Montgomery, Al 36104		
	3. Service Type ☐ Priority Mail Express®	
	☐ Adult Signature ☐ Registered Mail™	
	☐ Adult Signature Restricted Delivery ☐ Certified Mail® ☐ Certified Mail Restricted Delivery ☐ Registered Mail Restricted Delivery ☐ Return Receipt for	
	☐ Collect on Delivery Merchandise	
2 Article Musches (Transfer from service John C.	☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation™ ☐ Insured Mail ☐ Signature Confirmation	

Case 5:19 sps Packing HH Document

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United States

Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Filed 02/26/19

First-Class Mail Postage & Fees Paid

Permit No. G-10

USPS

Circuit Court Clerk, Civil Madison County Courthouse 100 North Side Square Huntsville, Alabama, 35801-4280 Civil Action: 47-CV-2019-900138

USPS TRACKING#



9590 9402 4221 8121 3859 11

First-Class Mail Postage & Fees Paid USPS Permit No. G-10

United States Postal Service Sender: Please print your name, address, and ZIP+4® in this box

Circuit Court Clerk, Civil Madison County Courthouse 100 North Side Square Huntsville, Alabama, 35801-4280 Civil Action: 47-CV-2019-900138

USPS TRACKING#



9590 9402 4221 8121 3859 35



First-Class Mail Postage & Fees Paid USPS Permit No. G-10

United States Postal Service

Sender: Please print your name, address, and ZIP+4® in this box

Circuit Court Clerk, Civil Madison County Courthouse 100 North Side Square Huntsville, Alabama, 35801-4280 Civil Action: 47-CV-2019-900138



47-CV-2019-900138.00

To: KENNETH D HAMPTON kenhampton@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following AFFIDAVIT OF CERTIFIED MAILING OF PROCESS AND COMPLAINT was FILED on 1/23/2019 11:14:35 AM

Notice Date: 1/23/2019 11:14:35 AM

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA (PRO SI CT CORPORATION SYSTEM
2 N JACKSON ST. SUITE 605
MONTGOMERY, AL, 36104-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: THE AEGIS TECHNOLOGIES GROUP INC, (PRO SE)
ATTN: HUMAN RESOURCES DEP
410 JAN DAVIS DRIVE
HUNTSVILLE, AL, 35806-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801



47-CV-2019-900138.00

To: INSURANCE PLAN THE AEGIS TECHNOLOGIES GROUP INC SH ATTN: HUMAN RESOURCES DEP 410 JAN DAVIS DRIVE HUNTSVILLE, AL, 35806-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

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47-CV-2019-900138.00

To: KENNETH D HAMPTON kenhampton@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

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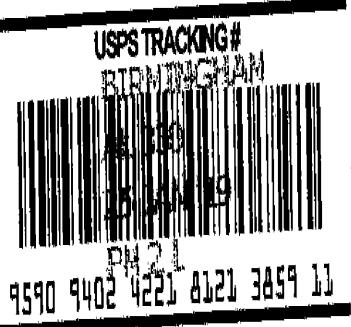
Notice Date: 1/23/2019 11:14:35 AM

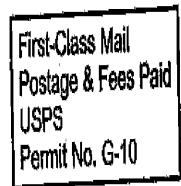
DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: The Aegis Technologies Group, Inc. Plan Administrator Attention: Human Resources Department of Jan Davis Drive Huntsville, Al 35806 	A. Signature A. Signature Addressee B. Received by Printed Name) C. Date of Delivery C. Date of Delivery D. Is delivery address different from item 1? If YES, enter delivery address below:
9590 9402 4221 8121 3859 11 2. Article Number (Transfer from service label) 7[11] 7970 0000 1000	S. Service Type Adult Signature Adult Signature Certified Mail Restricted Delivery Collect on Delivery Restricted Delivery Insured Mail Restricted Delivery Insured Mail Restricted Delivery Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt 3





United States Postal Service Sender: Please print your name, address, and ZIP+4® in this box

Circuit Court Clerk, Civil
Madison County Courthouse
100 North Side Square
Huntsville, Alabama, 35801-4280
Civil Action: 47-CV-2019-900138

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47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: HAMPTON KENNETH DEWAYNE kenhampton@bellsouth.net

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following matter was served on 1/28/2019

D002 THE AEGIS TECHNOLOGIES GROUP INC, Corresponding To CERTIFIED MAIL

> DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.
- 1. Article Addressed to:

The Aegis Technologies Group, Inc.

Short and Long Term Disability Insurance Plan

The Aegis Technologies Group, Inc., Designated Plan Agent

Attention: Human Resources Department

410 Jan Davis Drive. Huntsville, Al 35806



9590 9402 4221 8121 3859 28

2 Article Number (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

B. Fleceived by (Printed Name)

D. Is delivery address different from item 1?

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3. Service Type

Adult Signature

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(over \$500)

□ Certified Mail Restricted Deliver

Collect on Delivery □ Collect on Delivery Restricted Delivery

🛘 insured Mail

☐ Insured Mall Plestricted Delivery

FILEDIN OFFICE

□ Agent

C. Date of Delivery

☐ Yes

Addressee

() Peolstered Mail Restricted

Delivery

□ Return Receipt for Merchandise

☐ Signature Confirmation[™]

Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Rece

Case 5:19-cv-00335-MHH...Document 1-1 Filed 02/26/19 Page 59 of 6

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USPS
Permit No. G-10

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United States Postal Service Sender: Please print your name, address, and ZIP+40 in this box

Circuit Court Clerk, Civil Madison County Courthouse 100 North Side Square Huntsville, Alabama, 35801-4280 Civil Action: 47-CV-2019-900138

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47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: HAMPTON KENNETH DEWAYNE kenhampton@bellsouth.net

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following matter was served on 1/28/2019

D003 INSURANCE PLAN THE AEGIS TECHNOLOGIES GROUP INC SH

Corresponding To

CERTIFIED MAIL

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.
- 1. Article Addressed to:

COMPLETE THIS SECTION ON DELIVERY

A. Signature 4

Agent

Addressee

B. Received by (Printed Name)

D. Is delivery address different from item 1?

\[
\sum_{\text{Yes}}
\]

H VEC enter delivery address below:

The Prudential Insurance Company of America CT Corporation System, Registered Agent 2 North Jackson Street, Suite 605

Montgomery, Al 36104

9590 9402 4221 8121 3859 35

0000

□ Adult Signature
 □ Adult Signature Restricted Delivery
 □ Certified Mail®
 □ Certified Mail Restricted Delivery
 □ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

- 🗓 Insured Mail
- ☐ Insured Mail Restricted Convey (over \$500)

FILED IN OFFICE

JAN 31 2019

3. Service Type Clerk, Circuit Court Made on Convey Audu Express®

☐ Adult Signature ☐ Registered Mail™

Date of Delivery

□ No

- Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

United States Postal Service

Sender: Please print your name, address, and ZIP+4® in this box

Circuit Court Clerk, Civil
Madison County Courthouse
100 North Side Square
Huntsville, Alabama, 35801-4280
Civil Action: 47-CV-2019-900138





47-CV-2019-900138.00

Judge: CLAUDE E HUNDLEY III

To: HAMPTON KENNETH DEWAYNE kenhampton@bellsouth.net

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MARTIN LAWRENCE HALL V. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA ET 47-CV-2019-900138.00

The following matter was served on 1/28/2019

D001 THE PRUDENTIAL INSURANCE COMPANY OF AMERICA

Corresponding To

CERTIFIED MAIL

DEBRA KIZER CIRCUIT COURT CLERK MADISON COUNTY, ALABAMA MADISON COUNTY, ALABAMA 100 NORTHSIDE SQUARE HUNTSVILLE, AL, 35801